

19011080



# ANNUAL AUDITED REPORT FORM X-17A-5 PART III

SEC FILE NUMBER 8-49555

#### **FACING PAGE**

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING OF	3/01/2018	AND ENDING 07/3	1/2019
	MM/DD/YY		MM/DD/YY
A. REG	ISTRANT IDENTIFIC	CATION	
NAME OF BROKER-DEALER: Ace Dive	rsified Capital, Inc.		OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUSI	NESS: (Do not use P.O. B	ox No.)	FIRM I.D. NO.
923 E. Valley Blvd., Suite 213			
	(No. and Street)		
San Gabriel	CA	. 9	1776
(City)	(State)	(Zi	p Code)
NAME AND TELEPHONE NUMBER OF PER Lynwood Jen 626-30	RSON TO CONTACT IN F 07-8300	REGARD TO THIS REPO	DRT
		(/	Area Code – Telephone Number)
B. ACCO	DUNTANT IDENTIFI	CATION	
INDEPENDENT PUBLIC ACCOUNTANT w	nose oninion is contained i	n this Report*	
Brian W. Anson, CPA	tose opinion is contained i	ii diis reopore	
. (	Name – if individual, state last. j	îrst, middle name)	
18401 Burbank Blvd #120	Tarzana	CA	91356
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:			
✓ Certified Public Accountant			
Public Accountant			
Accountant not resident in Unite	ed States or any of its posse	essions.	
	FOR OFFICIAL USE O	NLY	

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

SEC 1410 (06-02)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

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## OATH OR AFFIRMATION

I, Lynnwood Jen		, swear (or affirm) that, to the best of
my knowledge and belief the accompanying finan- Ace Diversified Capital, Inc.		, as
of July 31	. 20 19	, are true and correct. I further swear (or affirm) that
neither the company nor any partner, proprietor, p	orincipal officer	or director has any proprietary interest in any account
classified solely as that of a customer, except as fo	ollows:	
ep normanical and attacket aux	_	Signature Jr
MWI And Notary Public		Title
This report ** contains (check all applicable boxes  (a) Facing Page.  (b) Statement of Financial Condition.  (c) Statement of Income (Loss).  (d) Statement of Changes in Financial Condit  (e) Statement of Changes in Stockholders' Eq	ion.	
(f) Statement of Changes in Liabilities Subort (g) Computation of Net Capital.	dinated to Clain	ns of Creditors.
(i) Information Relating to the Possession or	Control Require	ements Under Rule 15c3-3. Computation of Net Capital Under Rule 15c3-1 and the
		ements of Financial Condition with respect to methods of
(m) A copy of the SIPC Supplemental Report.	ies found to exis	t or found to have existed since the date of the previous audit

\*\* For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

## **ACKNOWLEDGMENT**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

attached, and not the truthfulness, accur validity of that document.	racy, or
State of California County ofLos Angeles	)
On August 27, 2019 before	me, Robert H. Appert, Notary Public, (insert name and title of the officer)
	(insert name and title of the officer)
personally appeared Lynnwood Jen	
who proved to me on the basis of satisfact subscribed to the within instrument and ac his/her/their authorized capacity(ies), and to	tory evidence to be the person(s) whose name(s) is/are throwledged to me that he/she/they executed the same in that by his/her/their signature(s) on the instrument the ch the person(s) acted, executed the instrument.
I certify under PENALTY OF PERJURY un paragraph is true and correct.	nder the laws of the State of California that the foregoing
WITNESS my hand and official seal.	ROBERT H. APPERT Notary Public - California
Minle	Los Angeles County  Commission # 2184401  My Comm. Explres Mar 16, 2021

Signature

(Seal)

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18401 Burbank Blvd., Suite 120, Tarzana, CA 91356 · Tel. (818) 636-5660 · Fax (818) 401-8818

#### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Shareholder's and Board of Directors of Ace Diversified Capital, Inc.

#### Opinion on the Financial Statements

I have audited the accompanying statement of financial condition of Ace Diversified Capital, Inc. as of July 31, 2019, the related statements of operations, changes in shareholder's equity, and cash flows for the year then ended, and the related notes (collectively referred to as the financial statements). In my opinion, the financial statements present fairly, in all material respects, the financial position of Ace Diversified Capital, Inc. as of July 31, 2019, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

#### **Basis for Opinion**

These financial statements are the responsibility of Ace Diversified Capital, Inc. management. My responsibility is to express an opinion on Ace Diversified Capital, Inc. financial statements based on my audit. I am a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and am required to be independent with respect to Ace Diversified Capital, Inc. in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

I conducted my audit in accordance with the standards of the PCAOB. Those standards require that I plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. My audit included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. My audit also included evaluating the accounting principles used and significant estimates made by management, as evaluating the overall presentation of the financial statements. I believe that my audit provides a reasonable basis for my opinion.

#### Supplemental Information

The information contained in Schedule I, II, and III ("Supplemental Information") has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The Supplemental Information is the responsibility of the Company's management. My audit procedures included determining whether the Supplemental Information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the Supplemental Information. In forming my opinion on the Supplemental Information, I evaluated whether the Supplemental Information, including its form and content is presented in conformity with 17 C.F.R. § 240.17a-5. In my opinion, Schedules I, II, and III are fairly stated, in all material respects, in relation to the financial statements taken as a whole.

Brian W. Anson, CPA

I have served as Ace Diversified Capital, Inc. auditor since 2004.

Tarzana, California

September 5, 2019

# Statement of Financial Condition July 31, 2019

#### **ASSETS**

Cash Commissions Receivable Deposits with Clearing Organizations Furniture and Equipment net of accumulated depreciation of \$129,260 Officer Loan Deferred Tax Asset (Note 2) Other Assets  Total Assets	\$ 84,188 35,814 50,871 - 49,878 17,027 11,922 249,700
LIABILITIES AND STOCKHOLDERS' EQUITY	
LIABILITIES	
Accounts Payable Commissions Payable	\$ 36,303 44,000
Total Liabilities	\$ 80,303
STOCKHOLDERS' EQUITY	
Common Stock, no par value, 55,000 shares authorized, issued, and outstanding Additional Paid-in-Capital Accumulated Deficit	\$ 55,000 376,650 (262,253)
Total Stockholders' Equity	\$ 169,397
Total Liabilities and Stockholders' Equity	\$ 249,700

# Statement of Operations For the Year Ended July 31, 2019

## **REVENUES**

Commissions Revenue from Sale of Investment Company shares Revenue from Sale of Insurance based products Interest Income Fees earned	\$ 420,708 70,393 11,154 14,706 2,565
Total Revenues	\$ 519,526
EXPENSES	
Clearing Fees Commissions Legal and Professional Fees Rent Other Expenses	\$ 65,296 362,915 57,442 21,600 43,432
Total Expenses	\$ 550,685
NET LOSS BEFORE INCOME TAXES	\$ (31,159)
LESS: INCOME TAX BENEFIT (Note 2)	 (8,719)
NET LOSS	\$ (22,440)

# Statement of Stockholders' Equity For the Year Ended July 31, 2019

	C	Common Stock	Additional Paid-In Capital	Retained Earnings ccumulated Deficit)	Sto	Total ockholders' Equity
Beginning balance, August 1, 2018	. \$	55,000	\$376,650	\$ (239,813)	\$	191,837
Net Loss				(22,440)		(22,440)
Ending balance, July 31, 2019	\$	55,000	\$376,650	\$ (262,253)	\$	169,397

# Statement of Cash Flows For the Year Ended July 31, 2019

#### CASH FLOWS FROM OPERATING ACTIVITIES:

Net Loss	\$ (22,440)
Adjustments to reconcile net income to net cash provided by operating activities:	
(Increase) decrease in assets	41.015
Commissions Receivable	41,015 (2,970)
Deposits with Clearing Organizations	(2,970)
Officer Loan Deferred Tax Asset	(8,719)
Other Assets	(256)
Olliei Assets	(250)
Increase (decrease) in liabilities	
Accounts Payable	35,964
Commissions Payable	(20,000)
Other Liabilities	
Total adjustments	44,056
Net cash provided by operating activities	\$ 21,616
Net increase in cash	\$ 21,616
Cash at beginning of year	62,572
Cash at end of year	\$ 84,188
Supplemental Disclosures	
Cash paid during the year for:	
Interest	\$ _
Income taxes	\$ 800

#### Notes to Financial Statements July 31, 2019

#### Note 1: GENERAL AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

#### General

Ace Diversified Capital, Inc. (the "Company") was incorporated in the state of California on July 31, 1996. The Company is a registered broker-dealer in securities under the Securities and Exchange Act of 1934, a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Corporation ("SIPC").

The Company is engaged in business as a securities broker-dealer, that provides several classes of services, including equities, options, mutual funds, and variable annuities. The Company transacts business with its clients in primarily California, and secondarily overseas in Taiwan and China.

The Company clears its clients' accounts through another broker-dealer, Wedbush, Inc., on a fully disclosed basis. The Company maintains a clearing deposit at Wedbush, which was \$50,871 at July 31, 2019.

#### Summary of Significant Accounting Policies

The Company uses the accrual basis of accounting for financial statement purposes. It is subject to regulation by SEC and FINRA.

Commissions receivable are stated at face amount with no allowance for doubtful accounts. An allowance for doubtful accounts is not considered necessary because probable uncollectible accounts are immaterial.

Securities transactions and the related commission income and expenses are recorded on a trade date basis.

#### Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates, but management does not believe such differences will materially affect the Company's financial position, results of operations, or cash flows.

#### Cash

The Company maintains cash deposits in an institution which is insured by the Federal Deposit Insurance Corporation. This government corporation insures balances up to \$250,000.

#### Revenue Recognition

The Company recognizes commission revenue when earned. The Company recognizes revenue as earned only when the price is fixed or determinable, persuasive evidence of an arrangement exists, the service is performed, and collectability of the related fee is reasonably assured.

#### Fair Value Measurement

The Company adopted ASC Topic 820, requiring a fair value measurement of certain financial instruments on a recurring basis. The adoption of ASC Topic 820 did not impact the Company's financial condition or results of operations. ASC Topic 820 defines fair value as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants on the measurement date. A fair value measurement

#### Notes to Financial Statements July 31, 2019

#### Note 1: GENERAL AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

assumes that the transaction to sell the asset or transfer the liability occurs in the principal market for the asset or liability.

ASC Topic 820 establishes a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The three levels of the fair value hierarchy are described below:

Level 1 - Valuations based on quoted prices in active markets for identical assets or liabilities that an entity has the ability to access.

Level 2 – Valuations based on quoted prices for similar assets and liabilities in active markets, quoted prices for identical assets and liabilities in markets that are not active, or other inputs that are observable or can be corroborated by observable data for substantially the full term of the assets or liabilities.

Level 3 – Valuations based on inputs that are supportable by little or no market activity and that are significant to the fair value of the asset or liability.

The Company had no financial instruments to measure for fair value as of July 31, 2019.

#### Concentrations of Credit Risk

The Company is engaged in various trading and brokerage activities in which counter parties primarily include broker-dealers, banks, and other financial institutions. In the event counter parties do not fulfil their obligations, the Company may be exposed to risk. The risk of default depends on the creditworthiness of the counter party or issuer of the instrument. It is the Company's policy to review, as necessary, the credit standing of each counterparty.

#### Note 2: INCOME TAXES

For the year ended July 31, 2019, the components of the Company's income tax benefit are as follows:

State Income Taxes (California)	\$ 2,754
Federal Income Tax	\$ 5,965
Total Income Tax benefit	\$ 8,719

Income taxes are provided for the tax effects of transactions reported in the financial statements and consist of taxes currently due. Deferred income tax assets and liabilities are computed annually for differences between the financial statement and tax basis of assets and liabilities that will result in taxable or deductible amounts in the future based on enacted tax laws and rates applicable to the periods in which the differences are expected to affect taxable income. Valuation allowances are established when necessary to reduce deferred tax assets to the amount expected to be realized. At July 31, 2019, management did not believe any valuation allowances were necessary.

As of July 31, 2019, the Company has an accumulated net operating loss with an estimated tax benefit of \$8,719 that expires in July 31, 2038

100% of the Company's revenues were generated in the State of California. The Company's tax returns are subject to examination by taxing authorities in the jurisdictions in which it operates in accordance with the normal statute of limitations in the applicable jurisdiction. Returns that were filed within the applicable statute remain subject to examination. The Company is subject to examination by the taxing agencies for fiscal years ending July 31, 2016, 2017, 2018.

#### Notes to Financial Statements July 31, 2019

#### Note 3: NET CAPITAL REQUIREMENT

The Company is subject to the uniform Net Capital Rule (SEC Rule15c3-1) of the Securities and Exchange Commission, which requires both the maintenance of minimum net capital and the maintenance of a maximum ratio of aggregate indebtedness to net capital, both as defined shall not exceed 15 to 1. Net capital and aggregate indebtedness change day by day, but at July 31, 2019, the Company's net capital of \$86,528 exceeded the minimum net capital requirement of 6 2/3% of aggregate indebtedness (\$5,354) or \$5,000, whichever is greater, by \$81,174 and the Company's ratio of aggregate indebtedness of \$80,303 to net capital was 0.93 to 1, which is less than the 15 to 1 maximum ratio requirement.

#### **Note 4: RELATED PARTY TRANSACTIONS**

The Company has an outstanding note receivable from one of its shareholders. The note carries an interest rate of 2% and will mature on July 31, 2022. At July 31, 2019 the outstanding balance of the note was \$49,878, of which \$978 was accrued interest, and it is included in the statement of financial condition.

#### Note 5: COMMITMENTS AND CONTINGENCIES

The Company is currently leasing an office space in San Gabriel, California, on a month to month basis. Rent expense for year ended July 31, 2019 was \$21,600. The Company has a branch office in Los Angeles, California, for which it does not incur rent expense.

#### ASU 2016-02: Leases

In February 2016, The FASB issued ASU 2016-02 on Leases. Under the new guidance, leases will be required to recognize a lease liability and a right-of-use asset for all leases at the commencement date (with the exception of short-term leases). ASU-2016-02 is effective for annual and interim periods beginning on or after December 15, 2018 and early adoption is permitted. The Company does not have a lease commitment where this applies and has adopted this change to its accounting process.

#### Note 6: RECENTLY ISSUED ACCOUNTING PRONOUNCEMENTS

#### Revenue Recognition - ASC 606

ASC 606, Revenue from Contracts with Customers, was issued on May 28, 2014. ASC 606 provides guidance related to revenue from contracts with customers. Guidance applies to all entities and to all contracts with customers, with the exception of the following transactions noted in ASC 606-10: lease contracts, insurance contracts, financial instruments and other contractual rights or obligations, guarantees, nonmonetary exchanges between entities in the same line of business. The Company applied ASC 606 on August 1, 2018 using the modified retrospective method. The Company has performed an assessment of its revenue contracts and has not identified any material changes to the timing or amount of its revenue recognition under ASU 2014-09. The Company's accounting policies did not change materially as a result of applying the principles of revenue recognition from ASU-2014-09 and are largely consistent with existing guidance and current practices applied by the Company.

Revenue is measured based on a consideration specified in a contract with a customer and excludes any sales incentives and amounts collected on behalf of third parties. The Company recognizes revenue when it satisfies a performance obligation by transferring control over a product or service to a customer. Taxes and regulatory fees assessed by a government authority or agency that are imposed on or concurrent with a specified revenue-producing transaction, that are collected by the Company from a customer, are excluded from revenue.

#### Notes to Financial Statements July 31, 2019

The Company generates its revenue from the sale of securities products in the form of commissions, concessions and trail commissions. The Company's commission income is derived from transactions when the Company is engaged as an agent. The Company does not participate in net gains or losses from transactions acting as a principal or riskless principal.

The Company's revenue comprises security commissions on the sale of equities and options, the sale of investment company shares, and insurance based product revenue. Additionally, the Company earns margin interest income.

Security commission revenue represents the sale of over-the-counter stock, put and call option trades, unit investment trusts, and insurance products. The revenue earned from the sale of these products is recognized upon satisfaction of performance obligations, which occurs on the trade date.

Revenue from the sale of investment company shares consists primarily of the sale of mutual fund products and 12b-1 fees related to the management of these assets. Revenue earned from the sale of these products is recognized upon satisfaction of performance obligations, which occurs on the settlement date. 12b-1 fees are recognized periodically based on average assets under management.

Insurance product revenue represents the sale of variable insurance products. The revenue earned from the sale of these products is recognized upon satisfaction of performance obligations, which occurs on the trade date. The Company also earns revenue from the management of variable annuity assets, which is recognized monthly, as earned, based on the average assets.

#### Note 7: SUBSEQUENT EVENTS

Management has reviewed the results of operations for the period of time from its year-end July 31, 2019 through September 5, 2019, the date the financial statements were available to be issued, and has determined that no adjustments were necessary to the amounts reported in the financial statements, nor have any subsequent events occurred, the nature of which would require disclosure.

### Schedule I Statement of Net Capital July 31, 2019

	Focus	3 07/3 1/2019	Audi	07/31/2019	Change
Stockholders' Equity, 07/31/2019	\$	159,700	\$	169,397	(9,697)
Less: Non-allowable Assets			,		-
Officer Loan		48,900		49,878	(978)
Deferred Tax Assets		8,308		17,027	(8,719)
Other Assets		15,964		15,964	-
Tentative net capital	\$	86,528	\$	86,528	-
Haircuts:		-		-	-
NET CAPITAL	\$	86,528	\$	86,528	<u> </u>
Minimum requirements of 6 2/3% of aggregate indebtedness or \$5,000, whichever is greater		5,354		5,354	-
Excess net capital	\$	81,174	\$	81,174	-
Aggregate indebtedness	\$	80,303	\$	80,303	-
Ratio of aggregate indebtedness to net capital		0.93:1		0.93:1	-

The differences between the audit and focus filed at 07/31/2019 caused by the interest on an officer note and the accrual for an income tax benefit.

July 31, 2019

# Schedule II Determination of Reserve Requirements Under Rule 15c3-3 of the Securities and Exchange Commission

The Company is exempt from the Reserve Requirement of computation according to the provision of Rule 15c3-3(k)(2)(ii).

# Schedule III Information Relating to Possession or Control Requirements Under Rule 15c3-3

The Company is exempt from the Rule 15c3-3 as it relates to Possession and Control requirements under the (k)(2)(ii) exemptive provision.

### **BRIAN W. ANSON**

Certified Public Accountant

18401 Burbank Blvd., Suite 120, Tarzana, CA 91356 • Tel. (818) 636-5660 • Fax (818) 401-8818

Independent Accountant's Report on Applying Agreed – Upon Procedures Related to an Entity's SIPC Assessment Reconciliation.

Board of Directors Ace Diversified Capital, Inc. San Gabriel, California

In accordance with Rule 17a-5 (e)(4) under the Securities Exchange Act of 1934, I have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments [General Assessment Reconciliation (Form SIPC-7)] to the Securities Investor Protection Corporation (SIPC) for the Year Ended July 31, 2019, which were agreed to by Ace Diversified Capital, Inc. and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC, solely to assist you and the other specified parties in evaluating Ace Diversified Capital, Inc. compliance with the applicable instructions of the General Assessment Reconciliation (Form SIPC-7). Ace Diversified Capital, Inc. management is responsible for the Ace Diversified Capital, Inc.'s compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, I make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures I performed and my findings are as follows:

- 1. Compared the listed assessment payment in Form SIPC-7 with respective cash disbursement records entries from the cash disbursements journal and related bank statements and reconciliations, noting no differences;
- 2. Compared the amounts reported on the audited Form X-17a-5 for the year ended July 31, 2019, as applicable with the amounts reported in Form SIPC-7 for the year ended July 31, 2019 noting no differences;
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, such as clearing firms records supporting securities revenues, noting no differences;
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers, such as revenues from third party support and bank records supporting the adjustments, noting no differences.

I was not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, I do not express such an opinion. Had I performed additional procedures, other matters might have come to my attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Brian W. Anson Certified Public Accountant

Tarzana, California September 5, 2019

# SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300

#### General Assessment Reconciliation

(36-REV 12/18)

For the fiscal year ended 7/31/2019 (Read carefully the instructions in your Working Copy before completing this Form)

#### TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

8-49555 FINRA JUL 07/08/1997 ACE DIVERSIFIED CAPITAL INC 923 EAST VALLEY BLVD STE 213	Note: If any of the information shown on the mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed.
SAN GABRIEL, CA 91776	Name and telephone number of person to contact respecting this form.
	WANWOOD JEN
	626-307-8300
. A. General Assessment (item 2e from page 2)	\$ 553,71
B. Less payment made with SIPC-6 filed (exclude Interest)	1_308.50
Date Paid C. Less prior overpayment applied	
	A. A.
D. Assessment balance due or (overpayment)	——————————————————————————————————————
E. Interest computed on late payment (see instruction E) ford	
F. Total assessment balance and interest due (or overpayment carrie	ad forward) \$
G. PAYMENT: √ the box Check mailed to P.O. Box □ Funds Wired □ ACH □	
Total (must be same as F above) \$	245.21
Total (must be same as F above)  H. Overpayment carried forward  \$(	<u> </u>
Total (must be same as F above)  H. Overpayment carried forward  \$(	e and 1934 Act registration number):
H. Overpayment carried forward \$(	
H. Overpayment carried forward \$(	CE VIVERSI FIZED CODITAL INC
H. Overpayment carried forward \$(	CE VIVERSI Fize Conital INC  (Name of Corporation, Parimership or chast organization)
H. Overpayment carried forward  S. Subsidiaries (S) and predecessors (P) included in this form (give name as SIPC member submitting this form and the person by whom it is executed represent thereby hat all information contained herein is true, correct and complete.  Oated the Aday of August, 20 19.  This form and the assessment payment is due 60 days after the end or a period of not less than 6 years, the latest 2 years in an easily a	CE VIVERSI Fize Capital INC  (Name of Corporation, Parimership or ofner organization)  [Authorized Signature]  CEO  (Title)  To the fiscal year. Retain the Working Conv. of this form
H. Overpayment carried forward  S. Subsidiaries (S) and predecessors (P) included in this form (give name lerson by whom it is executed represent thereby that all information contained herein is true, correct and complete.  Dated the 28 day of August, 20 19.  This form and the assessment payment is due 60 days after the end cor a period of not less than 6 years, the latest 2 years in an easily a	(Name of Corporation, Parimership or other organization)  (Title)  (Title)  of the fiscal year. Retain the Working Copy of this forecessible place.
H. Overpayment carried forward  Subsidiaries (S) and predecessors (P) included in this form (give name)  The SIPC member submitting this form and the error by whom it is executed represent thereby that all information contained herein is true, correct and complete.  Dated the 28 day of August, 20 19.  This form and the assessment payment is due 60 days after the end or a period of not less than 6 years, the latest 2 years in an easily a	(Name of Corporation, Parinership or ofher organization)  (Name of Corporation, Parinership or ofher organization)  (Name of Corporation, Parinership or of the organization)  (Name of Corporation, Parinership or of the organization, Parinership or of the organization)  (Name of Corporation, Parinership or ofher organization)  (Title)  (Title)  of the fiscal year. Retain the Working Copy of this forecessible place.

# DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amounts for the fiscal period beginning 8/1/2018 and ending 7/31/2019

Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)			Eliminate cents  \$ \( \mathcal{L} \mathcal{L} + \mathcal{L} \mathcal{L} \mathcal{L} \mathcal{L} \mathcal{L} + \mathcal{L} \mathcal{L} + \mathcal{L} \mathcal{L} \mathcal{L} + \mathcal{L} \mathcal{L} + \mathcal{L} \mathcal{L} + \mathcal{L} \mathcal{L} + \m
2b. Additions:			
<ol> <li>Total revenues from the securities business of subsidiaries predecessors not included above.</li> </ol>	(except fore	eign subsidiaties) and	Ø
(2) Net loss from principal transactions in securities in trading	accounts.		
(3) Net loss from principal transactions in commodities in tradi	ng accounts.		Ø
(4) Interest and dividend expense deducted in determining item	1 2a.		(0
(5) Net loss from management of or participation in the underw	riting or dist	ribution of securities.	
(6) Expenses other than advertising, printing, registration fees profit from management of or participation in underwriting of	and legal fee or distribution	es deducted in determining net n of securities.	
(7) Net loss from securities in investment accounts.			Ø
Total additions			
Deductions:     (1) Revenues from the distribution of shares of a registered oper investment trust, from the sale of variable annuities, from the advisory services rendered to registered investment comparancounts, and from transactions in security futures products.	he business (	of increasing from increasing	84113-
(2) Revenues from commodity transactions.			0
(3) Commissions, floor brokerage and clearance paid to other S securities transactions.	IPC members	s in connection with	65296-
(4) Reimbursements for postage in connection with proxy solicit	ation.	•	<u></u>
(5) Net gain from securities in investment accounts.			Q
(6) 100% of commissions and markups earned from transactions (ii) Treasury bills, bankers acceptances or commercial paper from issuance date.	in (i) certific r that mature	cates of deposit and nine months or less	U
(7) Direct expenses of printing advertising and legal fees incurred related to the securities business (revenue defined by Section 1).	ed in connect on 16(9)(L) o	tion with other revenue f the Act).	(f
(8) Other revenue not related either directly or indirectly to the s (See Instruction C);			
(Deductions in excess of \$100,000 require documentation)			<u>D</u>
(9) (i) Total interest and dividend expense (FOCUS Line 22/PAR Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	T IIA Line 13	, 	
<ul><li>(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).</li></ul>	\$	<u> </u>	
Enter the greater of line (1) or (11)		· .	<u> </u>
Total deductions			149409-
d. SIPC Net Operating Revenues		<i>-</i> \$_	369139-
e. General Assessment @ .0015		<b>5</b>	C(3.71
	_	(1	to page 1, line 2.A.) 14

#### **BRIAN W. ANSON**

Certified Public Accountant

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# REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

Board of Directors Ace Diversified Capital, Inc. San Gabriel, California

I have reviewed management's statements, included in the accompanying Exemption Report in which (1 Ace Diversified Capital, Inc., identified the following provisions of 17 C.F.R. §15c3-3(k) under which Ace Diversified Capital, Inc. claimed an exemption from 17 C.F.R. §240.15c3-3: (k)(2)(ii) (the "exemption provision") and (2) Ace Diversified Capital, Inc., stated that Ace Diversified Capital, Inc., met the identified exemption provision throughout the most recent fiscal year without exception Ace Diversified Capital, Inc.'s management is responsible for compliance with the exemption provision and its statements.

My review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and accordingly, included inquiries and other required procedures to obtain evidence about Ace Diversified Capital, Inc.'s compliance with the exemption provision. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, I do not express such an opinion.

Based on my review, I am not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

Brian W. Anson

Certified Public Accountant

Tarzana, California September 5, 2019



# **Assertions Regarding Exemption Provisions**

We, as members of management of Ace Diversified Capital Inc. ("the company"), are responsible for compliance with the annual reporting requirements under Rule 17a-5 of the Securities Exchange Act of 1934. Those requirements compel a broker or dealer to file annual reports with Securities Exchange Commission (SEC) and the broker or dealer's designated examining authority (DEA). One of the reports to be included in the annual filing is an exemption report prepared by an independent public accountant based upon a review of assertions provided by the broker or dealer. Pursuant to that requirement, the management of the Company hereby makes the following assertions:

#### **Identified Exemption Provision:**

The Company claims exemption from the custody and reserve provisions of Rule 15c3-3 by operating under the exemption provided by Rule 15c3-3, (k)(2)(ii).

## Statement Regarding Meeting Exemption Provision:

The Company met the identified exemption provision without exception throughout the period starting August 1, 2018 through July 31, 2019.

Ace Diversified Capital Inc.

By: